

FREEMAN, NOOTER & GINSBERG
ATTORNEYS AT LAW

LOUIS M. FREEMAN
THOMAS H. NOOTER*
LEE A. GINSBERG

75 MAIDEN LANE
SUITE 503
NEW YORK, N.Y. 10038

(212) 608-0808
Cell: (917) 847-1361

*NY AND CALIF. BARS

June 30, 2022

Honorable Sidney H. Stein
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

MEMO ENDORSED, p. 2

CONSENT Motion for Schedule Change

RE: United States v. Lessage Jean Baptiste, 15 Cr. 854 (SHS)

Your Honor:

I am writing to respectfully request a modification of the schedule for filing sentencing memoranda in this case. I am requesting an extension of two weeks until July 13, 2022, with the government to respond in another two weeks (July 27, 2022). I do not think the sentence date would have to be changed unless the Court prefers more time to review these submissions.

The reason for the request is that I had been waiting for the Court to issue a decision on the issues raised at the Fatico hearing on June 1, 2022, thinking that it would be appropriate to know the outcome of those objections before drafting a sentence memo. In discussing it with the prosecutor, AUSA Mathew Andrews, however, he thought the Court might not have intended to issue the decision prior to the sentencing date, and that we should just ask for a new filing schedule. I am also working with a mitigation specialist who does not have a final report ready for the Court.

I have discussed this with AUSA Mathew Andrews, who is one of the prosecutors handling this matter on behalf of the government, and he has no objection to this request.

I thank the Court for Your Honor's consideration of this application.

Sincerely,

/s/ Thomas H. Nooter

Thomas H. Nooter

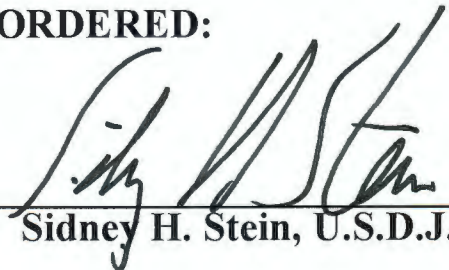
Attorney for Defendant

cc: AUSA Mathew Andrews, by ECF

The defense submissions are due by July 13, 2022, the government's submissions are due by July 27, 2022. The sentencing remains at August 16, 2022, at 10:00 a.m.

**Dated: New York, New York
June 30, 2022**

SO ORDERED:



Sidney H. Stein, U.S.D.J.